

Control Number: 48785



Item Number: 181

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**SOAH DOCKET NO. 473-19-1265
PUC DOCKET NO. 48785**

**APPLICATION OF ONCOR §
ELECTRIC DELIVERY CO, §
AEP TEXAS INC. AND LCRA §
TRANSMISSION SERVICES §
CORPORATION TO AMEND §
THEIR CERTIFICATES OF §
CONVENIENCE AND §
NECESSITY FOR 345-KV §
TRANSMISSION LINES IN §
PECOS, REEVES, AND WARD §
COUNTIES, TEXAS §**

BEFORE THE 2019 MAY 10 PM 1:11
PUBLIC UTILITY
FILING CLERK
**COMMISSION
OF TEXAS**

**CONCHO'S AND OXY'S
REQUEST FOR ORAL ARGUMENT**

TO THE HONORABLE COMMISSION:

COME NOW, COG Operating LLC (Concho)¹ and Occidental Permian Ltd., Oxy Delaware Basin, LLC, Oxy USA Inc, Oxy USA WTP LP, Houndstooth Resources, LLC, and Occidental West Texas Overthrust, Inc. (Oxy), under 16 TAC 22.262(d), to respectfully request the opportunity to provide oral argument at the May 23, 2019, open meeting.

The Commission Office of Policy & Docket Management division issued a notice on April 11, 2019 indicating the Commission will consider the Proposal for Decision (PFD) at its open meeting scheduled for 9:30 a.m. on May 23, 2019. The notice indicates parties' "presence at the open meeting is not required, but you are welcome to attend." The notice does not otherwise indicate the Commission will hear oral argument.

The proposed transmission line project is necessary to serve rapid load growth, primarily due to oil and natural gas production, processing, and transportation, and associated economic expansion. The PFD recognizes the area "is undergoing rapid development in energy infrastructure."² The number of intervenors is small and includes Concho, Oxy, and Plains Pipeline, companies

¹ COG Operating LLC operates as a wholly-owned subsidiary of Concho Resources Inc.

² PFD at 30.

active in the oil and gas business in the study area. Two traditional landowner intervenors are not affected by the routes discussed in the PFD.

Concho and Oxy provided detailed information about their development of the resources underlying the need for this project. Concho and Oxy raised concerns about engineering constraints and showed how the best way to avoid engineering constraints associated with their operations is to approve Route 325 Modified. The competitors worked with the Applicants to ensure requested modifications were supportable and did not create new engineering constraints. Concho and Oxy also support Oncor's and AEP's requested post-approval order language to provide the Applicants with flexibility to avoid engineering constraints.

This level of cooperation is unprecedented. The Applicants worked with Concho and Oxy because they recognized the need to avoid engineering constraints that can increase the constructed costs of the project and impact the safety of their workers.

Concho and Oxy respectfully request the Commission grant oral argument so the Commission can learn about the rapid development in the study area and its effects on this project, probe key details of evidence from on-the-ground engineers, and to ask questions about the engineering constraints in the oil fields.

WHEREFORE, PREMISES CONSIDERED, Concho and Oxy pray the Commission grant this Request for Oral Argument at the May 23, 2019 open meeting.

Respectfully submitted,

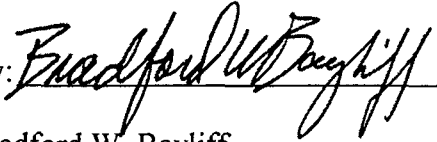
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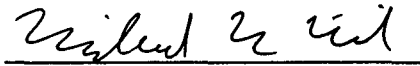
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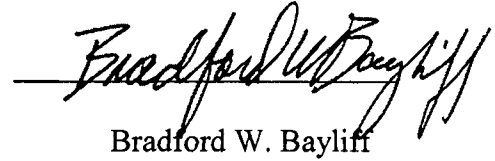
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OXY USA INC.

CERTIFICATE OF SERVICE

I certify that on this 10th day of May 2019, the foregoing document is being filed with the Public Utility Commission's Central Records office for posting on its Interchange system.


Bradford W. Bayliff